

**UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

**UNITED STATES OF AMERICA,**

**Appellee**

**v.**

**Nos. 06-3190, 06-3193, 07-3001  
07-3003, 07-3065, 07-3124  
Consolidated**

**KEITH B. MCGILL,  
DEON OLIVER,  
FRANKLIN SEEGER,  
KENNETH SIMMONS,  
JAMES ALFRED and  
RONALD ALFRED**

**Appellants**

**00cr00157-12  
00cr00157-18  
00cr00157-19  
00cr00157-20  
00cr00157-21  
02cr00045-01**

**APPELLANTS' JOINT MOTION FOR AUTHORIZATION  
FOR INVESTIGATIVE, EXPERT OR OTHER SERVICES**

**COMES NOW** the Appellants, by and through undersigned counsel, and respectfully requests that this Honorable Court authorize payment for investigative, expert or other services pursuant to the Criminal Justice Act, 18 U.S.C.

§2006(A)(e). In support of this request, the Appellants' submit the following:

1. Per order of this Court, Appellants' filed their 69,235-word Page-Proof Opening Brief on or about June 28, 2012.

2. Pursuant to further order of this Court, Appellants' filed their 34,522-word page-proof Reply Brief on February 28, 2014, and shall file their final briefs on or before April 30, 2014.

3. In order to prepare those briefs, Appellants retained the services of The Lex Group. Due to the volume of work inherent in preparing page-proof and final briefs exceeding 300 and 150 pages, respectively, The Lex Group's fee for preparation shall exceed \$800.00 per appellant. A copy of its invoice for Appellants' page-proof Opening Brief and its estimate for their page-proof Reply Brief are attached hereto as exhibits. Appellants submit that The Lex Group's fee for preparing their final briefs should mirror the attached invoice and estimate.

4. Appellants' submit that The Lex Group's fee is reasonable, in light of the size of the briefs prepared in their case.

5. This Court has the authority to provide authorization for services of the kind provided by The Lex Group to Appellants, where payment for such services will exceed \$800 per appellant. Because the orderly production of their briefs, especially given their size, is essential to Appellants' case, it is respectfully submitted authorization to exceed the monetary limits is warranted.

**WHEREFORE**, Appellants respectfully request that this Honorable Court enter an Order authorizing payment to The Lex Group to exceed \$800 per Appellant.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing motion has been served upon counsel for all parties via the Court's ECF system on this 7<sup>th</sup> day of March 2014.

/s/ Manuel J. Retureta

Manuel J. Retureta, Esq.